

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-80219-CR-CANNON

UNITED STATES OF AMERICA)
)
v.)
)
MICHAEL GORDON DOUGLAS,)
)
Defendant,)
)

)

**NOTICE OF FILING DECLARATION OF PATRICIA GALE DOUGLAS
IN SUPPORT OF DEFENDANT'S MOTION TO SUPPRESS EVIDENCE
OF WARRANTLESS SEARCH OF VEHICLE (DE 46)**

COMES NOW Defendant, MICHAEL GORDON DOUGLAS, by and through undersigned counsel, and gives Notice of the filing of the attached Declaration of Patricia Gale Douglas, the aunt of the Defendant, who was the owner of the Toyota Highlander at the time of his arrest.

CONCLUSION

The Defendant respectfully requests this court to accept the aforesaid Declaration in support of the Motion to Suppress Evidence Seized From Warrantless Search of Vehicle Douglas was Driving When Arrested which was dated July 5, 2024 as Docket Entry 46.

Dated this 16th day of July 2024

Respectfully submitted,

U.S. v. Michael Douglas, Case No. 23-80219-CR-CANNON Declaration of Patricia Gale Douglas in Support Motion to Suppress Warrantless Search (DE 46)

2

/s/John D. Kirby, Esq.

John R. Howes, Esq.

John R. Howes, Esq.

Counsel for the Defendant
Michael Gordon Douglas

/s/ John D. Kirby, Esq.

John D. Kirby, Esq.
401 W. A Street
Suite 1150
San Diego, CA 92101
610-557-0100
California Bar No. 149496
jkirby@johnkirbylaw.com

John R. Howes, Esq.

John R. Howes, Esq.
Howes Law Group, P.A.
110 SE 6th St., Suite 1700
Ft. Lauderdale, FL 33301
Phone: 954.328.2358
Florida Bar No. 0219193
Email: FloridaLawyer@outlook.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Filing Declaration of Patricia Gale Douglas has been furnished by Electronic Delivery using CM/ECF and to Assistant United States Attorney Gregory Schiller, Esq. at Gregory.schiller@usdoj.gov, to John D. Kirby, Esq. at jkirby@johnkirbylaw.com this 16th day of July, 2024.

John R. Howes, Esq.

John R. Howes, Esq.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,
Plaintiff,

vs.

MICHAEL GORDON DOUGLAS,
Defendant.

Case No. 23-cr-80219-CANNON

DECLARATION OF PATRICIA
GALE DOUGLAS

I, Patricia Gale Douglas, Declare:

1. I have personal knowledge of the facts stated in this Declaration and, if called as a witness, would testify to these facts.
2. I am the registered owner of a 2007 Toyota Highlander, California License Plate Number 5XLE531.
3. On December 12, 2023, I was informed that my nephew, Michael Gordon Douglas, was arrested while driving my Toyota Highlander.
4. I learned in approximately June of 2024 that agents had searched my Toyota Highlander after they had arrested my nephew, Michael Douglas, and had seized several items.
5. At no time did any member of law enforcement ask my permission to search my Highlander subsequent to Michael Douglas's arrest.
6. At no time did I give law enforcement permission to search my Highlander.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 13, 2024

Patricia Gale Douglas
Patricia Gale Douglas,
Declarant

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 13, 2024

Patricia Gale Douglas

Patricia Gale Douglas,
Declarant

CALIFORNIA JURAT WITH AFFIANT STATEMENT

GOVERNMENT CODE § 8202

See Attached Document (Notary to cross out lines 1–6 below)
 See Statement Below (Lines 1–6 to be completed only by document signer[s], not Notary)

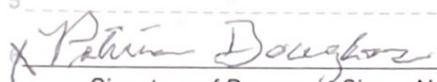
1

2

3

4

5



Signature of Document Signer No. 1

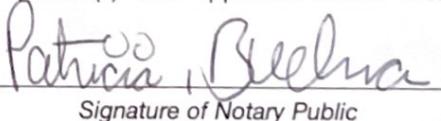
Signature of Document Signer No. 2 (if any)

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of San Diego

Subscribed and sworn to (or affirmed) before me
on this 13 day of July, 2074.
by (1) Patricia Gale Douglas
(and (2)),
Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence
to be the person(s) who appeared before me.

Signature 
Signature of Notary Public



Seal
Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or
fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: Declaration Document Date: 7-13-2024

Number of Pages: _____ Signer(s) Other Than Named Above: _____